

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT
SYSTEMS ANTITRUST LITIGATION

MDL No. 2817
Case No. 18-cv-00864

This Document Relates To:

Hon. Robert M. Dow, Jr.
Magistrate Judge Jeffrey T. Gilbert

Authenticom, Inc. v. CDK Global, LLC, et al.,
Case No. 1:18-cv-00868 (N.D. Ill.)

*Motor Vehicle Software Corp. v. CDK Global,
LLC, et al.*, Case No. 1:18-cv-00865 (N.D. Ill.)

**PLAINTIFFS AUTHENTICOM'S AND MVSC'S MOTION FOR LEAVE
TO FILE *INSTANTER* A BRIEF IN EXCESS OF FIFTEEN PAGES**

Pursuant to Local Rule 7.1, Plaintiffs Authenticom, Inc. ("Authenticom") and Motor Vehicle Software Corporation ("MVSC") respectfully request leave to file *instanter* a memorandum of law in excess of 15 pages in support of its Motion for Sanctions Against Defendant The Reynolds and Reynolds Company ("Reynolds") for the intentional destruction of evidence. Authenticom seeks to file *instanter* a brief of no more than 22 pages. In support of this Motion, Authenticom and MVSC state as follows:

1. In light of the seriousness of Reynolds's misconduct described in the brief, the additional pages requested by Authenticom and MVSC are necessary in order to provide the Court with the facts and legal precedent in support of their motion for sanctions against Reynolds.
2. Counsel for Authenticom and MVSC has made every effort to keep the brief as concise as practicable. But counsel believes that a maximum of 22 pages is necessary to allow for an intelligent and helpful presentation of Authenticom's and MVSC's arguments.
3. For the foregoing reasons, good cause exists for Authenticom and MVSC to file *instanter* a brief in support of its motion for sanctions of up to 22 pages.

4. Authenticom's and MVSC's are concurrently filing their proposed 22-page Memorandum. The Memorandum is being filed under seal and Authenticom and MVSC will serve all parties to this MDL with an unredacted copy by email. Should the Court grant this Motion, Authenticom and MVSC will promptly file a public redacted version of the Memorandum.

WHEREFORE, Authenticom and MVSC respectfully request that the Court grant this motion and allow Authenticom and MVSC to file *instanter* a brief of up to 22 pages in support of its motion for sanctions against Reynolds.

Dated: February 8, 2021

/s/ Derek T. Ho

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CERTIFICATE OF SERVICE

I, Derek T. Ho, an attorney, hereby certify that on February 8, 2021, I caused a true and correct copy of the foregoing **PLAINTIFFS AUTHENTICOM'S AND MVSC'S MOTION FOR LEAVE TO FILE INSTANTER A BRIEF IN EXCESS OF FIFTEEN PAGES** to be filed and served electronically via the Court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF system.

/s/ Derek T. Ho

Derek T. Ho

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